

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
Southern District of TexasUnited States District Court
Southern District of Texas
FILED

NOV 25 2014

United States of America)

v.)

1.) Amy Hernandez)
YOB: 1991, USC)
See Attachment B)Case No. m-14-2236-m

Clerk of Court

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 24, 2014 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

21 USC 952(a)

Knowingly and intentionally import into the United States from the United Mexican States approximately 2.32 kilograms of cocaine, a Schedule II controlled substance, and did knowingly and intentionally possess with the intent to distribute approximately 2.32 kilograms of cocaine, a Schedule II controlled substance


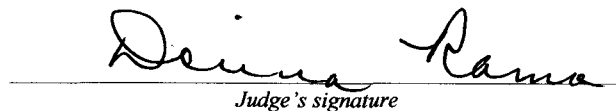
21 USC 841(a)(1)

This criminal complaint is based on these facts:

On November 24, 2014, a Ford Expedition arrived at the Hidalgo, Texas Port of Entry from Mexico. United States Customs and Border Protection Officer (CBPO) E. Clough was working the primary inspection area where he obtained a negative declaration from the driver, Amy HERNANDEZ, and the passenger, Dayra GUERRERO, of any contraband. CBPO G. Rizo referred the vehicle to secondary

See Attachment A

✓ Continued on the attached sheet.


Sworn to before me and signed in my presence. *Acst*
Complainant's signatureStephanie Hard, HSI Special Agent
Printed name and titleDate: 11/25/2014
Judge's signatureCity and state: McAllen, TexasDorina Ramos, U.S. Magistrate Judge
Printed name and title

Attachment "B"

2.) Dayra Guerrero
YOB: 1987
Mexican Citizen

Attachment "A"

inspection area.

CBPO Lisa Langner, who was working the secondary inspection area, observed both HERNANDEZ and GUERRERO displaying nervous behavior. CBPO Langner discovered a bulge on the back area of both subjects. CBPO then requested K-9 Officer E. Clough to run his dog. The K-9 alerted to the odor of narcotics on each subject. One brick was discovered taped to the back of each subject. The bricks were probed which resulted in a substance which field tested positive for cocaine.

A short time later, Homeland Security Investigations (HSI), Special Agent (SA) Stephanie Hard arrived at the Port of Entry and was apprised of the situation. HERNANDEZ and GUERRERO were read their Miranda rights separately and both agreed to answer questions without a lawyer present.

HERNANDEZ stated she knew the brick that was taped to her was drugs, but did not know the type of drugs. HERNANDEZ stated she had crossed with drugs taped to her body on three different occasions. HERNANDEZ stated she would receive \$500.00 once she delivered the drugs to a man on the U.S side.

GUERRERO stated she believed what was taped to her body was cocaine. GUERRERO stated she had crossed drugs taped to her body on four different occasions. GUERRERO stated she would receive \$1000.00 once she delivered the drugs to a man on the U.S. side.

The total weight of the cocaine was 2.32 kilograms, with each brick weighing 1.16 kilograms.